

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SANDRA MCLEAN
xxx-xx-3523

Debtor.

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:CHAPTER 13
:CASE NO. 18-13998/JKF

U.S. BANK NATIONAL ASSOCIATION
AS LEGAL TITLE TRUSTEE FOR
TRUMAN 2016 SC6 TITLE TRUST

Movant,

V.

SANDRA MCLEAN

Debtor,

:Hearing Date: September 25, 2019 @ 9:30 a.m.

WILLIAM C. MILLER

:Courtroom #3

Trustee,

Respondents.

**STIPULATION RESOLVING MOTION BY U.S. BANK NATIONAL ASSOCIATION AS
LEGAL TITLE TRUSTEE FOR TRUMAN 2016 SC6 TITLE TRUST FOR RELIEF FROM
THE AUTOMATIC STAY TO PERMIT MOVANT TO EXERCISE ITS RIGHTS UNDER
STATE LAW AGAINST CERTAIN REALTY KNOWN AS
533 WILLOW AVENUE, FOLCROFT, PENNSYLVANIA 19032**

THIS matter being opened to the Court by Emmanuel J. Argentieri of the law office of Romano Garubo & Argentieri, counsel for the secured creditor, US Bank NA as Legal Title Trustee for Truman 2016 SC6 Title Trust, (hereinafter “US Bank”), upon the filing of a motion for relief from stay as to real property, more commonly known as 533 Willow Avenue,

Folcroft, Pennsylvania 19032; and Kenneth E. West, Esquire of the law office of Douglass West & Associates appearing on behalf of Debtor; and the parties have amicably resolved their differences and for good cause shown;

1. If any valid proofs of payment are produced by the Debtor that have not yet been credited, her post-petition mortgage account shall be adjusted accordingly.
2. Debtor recently brought her post-petition account current through August 1, 2019.
3. Debtor shall remit her September 1, 2019 post-petition payment timely.
4. Debtor shall reimburse US Bank attorney fees totaling \$850.00. Commencing with the October 1, 2019 post-petition payment and continuing each month thereafter through and including March 1, 2020, Debtor shall reimburse the aforesaid attorney fees by remitting regular monthly mortgage payments, plus 1/6 of the fees (\$141.67).
5. Commencing with the April 1, 2020 post-petition mortgage payment and continuing each month thereafter for the duration of this Chapter 13 proceeding, Debtor shall remit payments directly to US Bank as same come due.
6. If the case is converted to a Chapter 7, US Bank shall file a Certification of Default with the Court and request that the Court enter an Order granting it relief from the automatic stay.
7. If any of the aforementioned stipulation payments and/or regular monthly mortgage payments are more than thirty (30) days late, US Bank may send Debtor a written notice of default of this Stipulation. If the default is not cured within ten (10) days of the date of

the notice, counsel for US Bank may file a Certification of Default with the Court and the Court shall enter an Order granting it relief from the automatic stay as to the mortgaged property herein.

The undersigned hereby consent to the form and entry of the within order.

/S/EMMANUEL J. ARGENTIERI

Emmanuel J. Argentieri, Esquire
Attorney for US Bank

Date: 10/23/19

/S/KENNETH W. WEST

Kenneth E. West, Esquire
Attorney for Debtor

Date: 10/22/19

AND NOW, this _____ day of _____, 2019, it is hereby ORDERED that the foregoing Stipulation is approved, shall be, and is made an Order of this Court.

Honorable Jean K. FitzSimon
U.S. Bankruptcy Judge, Eastern District of
Pennsylvania